

## Koch, Kristine

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**From:** Koch, Kristine  
**Sent:** Friday, May 08, 2015 2:41 PM  
**To:** Gene Revelas  
**Cc:** Jennifer Woronets (jworonets@anchorage.com); jim.mckenna@verdantllc.com; 'Bob Wyatt'; 'Patty Dost'; Allen, Elizabeth; Cora, Lori  
**Subject:** RE: Questions/Clarifications on EPA Direction  
**Attachments:** Session 7A-3\_Biedenharn.pdf

Gene – Here is a copy of the paper.

Kristine Koch  
Remedial Project Manager  
USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue, Suite 900, M/S ECL-122  
Seattle, Washington 98101-3140

(206)553-6705  
(206)553-8581 (fax)  
1-800-424-4372 extension 6705 (M-F, 8-4 Pacific Time, only)

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**From:** Gene Revelas [mailto:grevelas@integral-corp.com]  
**Sent:** Friday, May 08, 2015 11:59 AM  
**To:** Koch, Kristine  
**Cc:** Jennifer Woronets (jworonets@anchorage.com); jim.mckenna@verdantllc.com; 'Bob Wyatt'; 'Patty Dost'; Allen, Elizabeth; Cora, Lori  
**Subject:** RE: Questions/Clarifications on EPA Direction

Thank you. I would like a copy of the paper for our files. Gene

Gene Revelas | Senior Managing Scientist  
Integral Consulting Inc. | [www.integral-corp.com](http://www.integral-corp.com)  
1205 West Bay Drive NW | Olympia, WA 98502  
Tel: 360.705.3534, ext. 418 | Cell: 360.870.4950 | Fax: 360.705.3669

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

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**From:** Koch, Kristine [mailto:Koch.Kristine@epa.gov]  
**Sent:** Friday, May 08, 2015 11:57 AM  
**To:** Gene Revelas  
**Cc:** Jennifer Woronets (jworonets@anchorage.com); jim.mckenna@verdantllc.com; 'Bob Wyatt'; 'Patty Dost'; Allen, Elizabeth; Cora, Lori  
**Subject:** RE: Questions/Clarifications on EPA Direction

Gene – As we discussed on the conference call today, see my responses, below. I've attached my responses to the references. I could not find the first two, but they are cited in the attached LWG FSR. It was a good thing that you asked me for the last one because there was a typo in his name. I have provided the correct reference. Please correct in the draft final RI report. I have a copy of the paper. If you would like a copy for your records, I'd be happy to send along.

Let me know if you have any further questions regarding our responses.

Regards,

Kristine Koch  
Remedial Project Manager  
USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency  
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Seattle, Washington 98101-3140

(206)553-6705  
(206)553-8581 (fax)  
1-800-424-4372 extension 6705 (M-F, 8-4 Pacific Time, only)

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**From:** Gene Revelas [<mailto:grevelas@integral-corp.com>]  
**Sent:** Thursday, May 07, 2015 1:48 PM  
**To:** Koch, Kristine  
**Cc:** Jennifer Woronets ([jworonets@anchorgea.com](mailto:jworonets@anchorgea.com)); [jim.mckenna@verdantllc.com](mailto:jim.mckenna@verdantllc.com); 'Bob Wyatt'; 'Patty Dost'  
**Subject:** Questions/Clarifications on EPA Direction

Hi Kristine –

Please see the following questions for you along with some clarifications from us regarding the “EPA Direction to LWG on Production of Draft Final Remedial Investigation Report...” received on April 27, 2015. EPA comments are italicized and followed by our question or response.

*1. Incorporate all text revisions in attached Word documents. We have provided both redline and clean copies of the text, except Sections 2, 9, and the Executive Summary which are only provided in clean copy.*

Integral will provide EPA a redline/strikeout of EPA’s clean Draft Final RI text as well as a clean version of the revised text in Word and as a compiled PDF.

EPA Response: This is acceptable.

*10. Include the data reports listed in the attached document provided by the LWG in electronic format only as Appendix A5 in the draft final RI report.*

Can we provide this DVD set with the hard-copy Final RI submittal following EPA approval of the electronic version of the Draft Final RI ?

EPA Response: Yes, this is acceptable since EPA has already reviewed the documents and they are just provided as an attachment to the document. Please provide a placeholder for this in the document submitted.

*13. Ensure that RI database is accurate and that all data used for the RI are included in the final RI database. Noted missing information includes upriver dioxin/furan congener data, bioassay results, and results of the LRM and FPM.*

The congener and bioassay data will be added. What does EPA mean by the “results of the LRM and FPM”? The SQVs that result from each model are presented in Tables 6-10 and 6-11 of the BERA. Are you asking us to add those values to the database?

EPA Response: Provide the Pmax values, not the SQVs.

*14. If the LWG notes errors in values in Section 5, please correct and note those errors in a separate documented list when providing the draft final RI report to EPA.*

Can we correct the values in the redline text and data products rather than in a separate documented list? We would include comment bubbles as needed to provide back up for the revision.

EPA Response: Yes, this is acceptable.

*21. Either remove the data analyzed by method SOM01.2 for hydrocarbons prior to conducting background calculations or do not conduct background calculations for hydrocarbons as there are too few detections in the data set (see comment 20). Although the results for PAH compounds exhibit detection limits consistent with other methods, all reported detections are estimated, and the majority of the detection limits themselves appear to be estimated. The frequency of detection for PAHs was exceedingly low (2/19 for benzo(a)pyrene, 1/19 for naphthalene, and 2/19 for phenanthrene). If the LWG is confident that the anthropogenic background for these PAHs in this reach of the river is essentially below detection, then the data should continue to be included.*

We will not calculate background values for these compounds.

EPA Response: It is acceptable that the LWG not calculate background values for these compounds, but need to state that the background level is the method detection level.

*25. OC-corrected values shall be calculated using a TOC of 1.71 percent for the site, consistent with what was done in Section 7 of the RI and in the dispute decision. Further, Table H2b shall present only OC-corrected values with outliers removed.*

The Study Area average OC value changed from 1.71% to 1.79% when we updated the RI Report data set for the Final RI, at EPA's request, by incorporating the former Appendix H data into the main report. This results in a revised OC-correction factor of 1.79%/1.11% or 1.61. Is it OK for us to utilize this revised value since it is based on EPA's requested RI data set?

EPA Response: Since this was part of the LWG dispute that has been settled, the calculations are to be conducted as specified in the dispute decision. EPA staff cannot override the decision. It is acceptable to include a footnote that states that the value is based on the data collected between a certain date range and indicate that new data has been collected and included in the final RI report that changes the value.

## **ADDITIONAL REQUEST AND QUESTION**

EPA included a few citations in the document text for which we need bibliographic details. A list of those citations is attached to this e-mail. Please provide the bibliography details so we can complete the list of references.

See attached. Also, please make all EPA references "USEPA" rather than "EPA".

For the final submittal of the electronic version, can we simply send you an email before the deadline informing you that the document is posted to the server?

EPA Response: Yes, that is acceptable. Also send 3 copies on DVD.

Appendix I is the Interactive Map Application of the revised Section 10 Panels. Does EPA still want these? If so, we would like to prepare this appendix after EPA approves the Draft Final RI and provide it with the Final RI. Is that okay?

EPA Response: EPA still wants the inclusion of the Section 10 panels in Appendix I. It is acceptable to provide just the panels and make them interactive for the final RI.

We have a placeholder for a meeting tomorrow in Olympia. Because these are rather straightforward questions and clarifications, if needed we recommend a conference call instead of an in-person meeting. Jim and I are available tomorrow from 9 to noon for the call. Let us know if that works for you.

Thanks, Gene.

Gene Revelas | Senior Managing Scientist  
Integral Consulting Inc. | [www.integral-corp.com](http://www.integral-corp.com)  
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Tel: 360.705.3534, ext. 418 | Cell: 360.870.4950 | Fax: 360.705.3669

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